

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X
	:
	:
IN RE CBS BROADCASTING INC.,	: Miscellaneous Case No. <u>20-mc-739</u>
	:
Non-Party Movant.	: Underlying Litigation:
	: <i>In re Watts Coordinated Pretrial</i>
	: <i>Proceedings</i>
	: Case No. 19-cv-1717
	: United District Court for the Northern
	: District of Illinois
	:
	:
-----	X

**NOTICE OF MOTION**

Non-Party CBS Broadcasting Inc. (incorrectly served as CBS Broadcast Center), by and through undersigned counsel, respectfully submits this motion to quash the subpoenas *duces tecum* issued by the Defendant Police Officers on November 5, 2020. The subpoena seeks material protected by the reporter's privilege, and is overbroad and unduly burdensome.

Accordingly, CBS Broadcasting Inc. respectfully requests that the Court quash the subpoena before CBS Broadcasting Inc. incurs any additional temporal or monetary burdens to contest or otherwise respond to them.

Dated: New York, New York  
December 11, 2020

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Jay Ward Brown

Jay Ward Brown  
Mara Gassmann (*pro hac vice* forthcoming)  
1675 Broadway, 19th Floor  
New York, NY 10019  
Phone: (212) 850-6119  
Fax: (212) 223-1942

brownjay@ballardspahr.com  
gassmannm@ballardspahr.com

*Counsel for Non-Party CBS Broadcasting Inc.*